

**BEFORE THE COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION**

Post-Hearing Data Integrity Exhibit of Witness King (K.C.) Timmons

**ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.
AND TCG OHIO, INC.
CASE NO. 2001-105
November 12, 2001**

Data Integrity Issues Update for Kentucky

Issue: Data Missing from AT&T Reports

On pages 9-11 of the July 9, 2001 data integrity testimony, AT&T describes hundreds of orders that were missing from AT&T's UNE-P trial data. Correspondence with BellSouth has confirmed that orders were indeed missing. Attached is a letter (*Attachment A*) dated October 22, 2001 from AT&T to BellSouth which summarizes the missing data and requests that BellSouth provide the date by which it will correct these data discrepancies. BellSouth has not responded to this letter.

On page 12 of the July 9, 2001 data integrity rebuttal testimony, AT&T describes BellSouth's reported deficiencies related to the FOC and Reject Completeness measure for May 2001. AT&T also states that failure to return data on transactions for AT&T calls into serious question the validity of BellSouth's FOC and rejection timeliness reports. BellSouth has continued to have problems with this measure in September. (*See page 15 of the August 27 data integrity testimony.*) AT&T conducted an analysis of its

September FOC timeliness, rejection timeliness, and FOC and Rejection Completeness reports and found that the raw data files for these reports still contain discrepancies. More specifically:

- There are 480 LSRs in the Response Completeness raw data that have a 1, 2, or 3 in the "RESP_CNT" field (which means they either received a FOC or Reject) that did not have a corresponding LSR populated in the FOC or Reject raw data.
- There are 6 LSRs in the Response Completeness raw data file with a 0 in the "RESP_CNT" field that do have a corresponding LSR populated in the FOC or Reject raw data. If they have a 0 in the "RESP_CNT" field, then they should not have a FOC or Reject reported.
- There are 17 LSRs populated in the FOC or Reject raw data that are not present in the Response Completeness raw data.

See Analysis Summary (*Attachment B*)

Issue: Inconsistencies between Performance Reports

On page 13-15 of the July 9, 2001 data integrity testimony AT&T describes inconsistencies among the various reports that raises serious questions about the validity of the data.

In this testimony AT&T refers to an analysis of January data provided to BellSouth via a letter, which was contained in Exhibit SEN-11 of the testimony. A similar analysis was conducted for September, which is included as an attachment. As the data indicate, discrepancies continue to exist.

See Attached Table (*Attachment C*)

Issue: Missing Raw Data

On pages 17-20 of the July 9, 2001 data integrity testimony AT&T describes the types of data underlying the performance reports ("raw data") that BellSouth was not providing to AT&T. Although BellSouth has made progress in this area, it still does not provide the following raw data:

- Raw data for LNP flow-through report

- Raw data for orders classified as projects
- Raw data for “dummy FOCs”
- Raw data for rejections or completion notices when the notice is issued in a month different than other order activities, e.g. if the request is received in one month, but rejected the next month, the data is not included in the raw data or the reports. Similarly, if an order is completed one month, but the completion notice is sent the next month, the completion notice data is not included in the reports or the raw data.

Issue: KPMG has open findings of deficiency in Georgia and the audit is not complete.

On pages 20-21 of the July 9 data integrity testimony, AT&T describes open exceptions in Georgia. Georgia still has five open exceptions in Georgia related to performance measures (Exceptions 86, 89, 122, 136, and 137). Further, at the request of the Commission, KPMG is conducting an audit of the current BellSouth performance measures. Both these reviews are not scheduled to conclude until March 2002.

Issue: KPMG has open findings of deficiency in Florida and that performance measures review is not complete.

On pages 22-23 of the July 9 data integrity testimony, AT&T describes the status of the Florida third party test, including open observations and exceptions. As of November 3, Florida has 9 open observations and 9 open exceptions regarding performance measures. The Florida third party test is currently not expected to conclude prior to mid-January 2002.

Issue: The CLEC aggregate data provided is also flawed.

In the August 27 data integrity testimony, pages 10-14 describe various discrepancies in the Kentucky CLEC aggregate data. Kentucky August CLEC aggregate data continues to experience the same problems.

Reporting Data Twice:

- In PMAP, BellSouth is still repeating the loop/port combinations performance data under the UNE/Other Non-Design product disaggregation for the following measures:

- % Rejected Service Requests
- Reject Interval
- FOC Timeliness
- FOC and Reject Response Completeness

Missed Appointments vs. Completion Notice volumes for loop/port combinations:

Note: The KY MSS for September is not available. This summary is based on August MSS data.

•Loop/Port Combinations Non-Dispatch

- Missed Appointments CLEC Aggregate metric = 2147
- Completion Notice CLEC Aggregate metric – 1982
- There is a difference in volume of 165 LSRs or 7.7%

Difference in volumes between % Rejected Service Request, FOC/Reject Response Completeness, and FOC/Reject Response Completeness (Multiple Responses) metrics:

Note: The volumes below are for the CLEC Aggregate in the August KY MSS report.

UNE-P

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	2571	2571	2526
Partially Mechanized	1190	1190	1188
Non-Mechanized	135	135	132

LNP Stand-alone

	% Rejected Volume	FOC/Rej. Volume	FOC/Rej. Volume Multiple Responses
Fully Mechanized	379	43	43
Partially Mechanized	325	703	703
Non-Mechanized	90	92	92

October 22, 2001

Dear Ranae,

On October 19, 2001, I received via e-mail a letter from you dated October 12, 2001. In that letter you provided additional information from issues raised at our August 23, 2001 meeting, and asked for additional data from AT&T "to the extent AT&T wants BellSouth to continue to investigate the issues it has raised."

Your latest response on the issue of data missing from AT&T's November 2000 raw data files provides a good opportunity to review what we have learned from your investigation to date, and create plans for correction of these deficiencies. Additionally, AT&T has received information through other communication with BellSouth that is relevant to our investigation and should therefore also be included in formulating corrective action plans. For example, AT&T has been provided information regarding data integrity through regulatory proceedings and through responses to inquiries regarding discrepancies in AT&T's commercial data.

As a preliminary matter, AT&T believes that it is entitled, through two Orders of the Georgia Public Service Commission, to all the raw data underlying the performance reports it receives from BellSouth. Therefore, even to the extent certain data is authorized to be excluded from metrics calculations, there is no corresponding authorization to exclude data from the raw data files provided by BellSouth to AT&T.

Attached is a list of discrepancies uncovered through this investigation or others that also affect AT&T's UNE-P performance reports, and whether or not we believe the discrepancy has been corrected. For those for which no correction is indicated, AT&T requests that BellSouth provide a response by November 6, 2001 indicating by what date it will correct each noted deficiency. You will see that the attachment includes both deficiencies in the provision of raw data and deficiencies due to the unauthorized exclusion of data from metrics calculations.

Finally, to the issue of next steps. BellSouth has advised AT&T, via regulatory proceedings, that data from November 2000, "is irrelevant as that data predates implementation of the SQM and the attendant programming changes." Given BellSouth's position, and the outstanding issues outlined in this letter which BellSouth needs to correct to improve its data accuracy, most of which do not appear to be corrected by BellSouth's recent programming changes, it is AT&T's recommendation that future investigative efforts focus on a period (using commercial data) that BellSouth believes to contain all AT&T's raw data, and therefore be accurate and complete.

Ranae, please direct all BellSouth's responses regarding correction of these deficiencies and the subsequent month of data BellSouth recommends AT&T use to validate BellSouth's reporting for UNE-P orders to Bernadette Seigler. Bernadette will work these issues with you through to completion.

Thank you.

Sincerely,

Edward L. Gibbs

No LSR in FOC or Hej. Haw Data

No LSR in FCC or Rej. Raw Data

VER	PON	Is it in FCC or Rej. Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACQSTN_ID
3	JUCY0101349	No	8300	1	1 UNE Combos - Loop + Port (Ordering)	FL	3
0	CLARK830	No	7125	1	1 UNE Directory Listing	AL	3
0	CLEAN0912	No	7125	1	1 UNE Directory Listing	NC	3
0	CHUCK912	No	7125	1	1 UNE Directory Listing	FL	3
0	BETSY912	No	7125	1	1 UNE Directory Listing	GA	3
0	ATLP0104147	No	7125	1	Business	GA	3
0	ATLP0104375	No	7125	1	ISDN Basic Rate Business Non-Design	GA	3
0	ATLP0104384	No	7125	1	Special (Ordering)	GA	3
0	ATLP0104408	No	7125	1	Special (Ordering)	GA	3
0	ATLP0104497	No	7125	1	Business	GA	3
3	ATLY0105866	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
2	ATLY0105866	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
1	ATLY0105866	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
1	ATLY0105995	No	8392	1	Combos - Loop + Port (Ordering)	FL	3
0	ATLY0105995	No	8392	1	Combos - Loop + Port (Ordering)	FL	3
2	ATLY0106270	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
1	ATLY0106270	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
0	ATLY0106270	No	8392	1	Combos - Loop + Port (Ordering)	GA	3
0	AYSTOCK918	No	8300	1	UNE Directory Listing	FL	3
0	A0001IDSSCGA2636	No	7421	1	UNE Directory Listing	GA	3
1	A0001IDSSCGA2636	No	7421	1	UNE Directory Listing	GA	3
0	914WADS	No	7125	1	UNE Directory Listing	NC	3
1	3302712636AA	No	7421	1	UNE Directory Listing	NC	3
0	3302712636AA	No	7421	1	UNE Directory Listing	NC	3
0	083022FPMC0000011	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
0	078031FPMC0000006	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
0	078011FPMC0000012	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
1	078011FPMC0000003	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
2	078011FPMC0000004	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
1	078011FPMC0000004	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
0	078011FPMC0000006	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	FL	3
0	078011FPMC0000006	No	7125	1	UNE 2W Analog Loop Non-Design w/o NP	GA	2
2	ZXMAX0113296	No	8392	1	Combos - Loop + Port (Ordering)	GA	7
		No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	

No LSR in FCC or Rej Raw Data

VER	PON	Is it in FCC or Rej Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACGSTN_ID
3	ZKMMAY0114281	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7
0	7707724828	No	7421	1	JUNE Directory Listing	GA	8
1	ATLY0106451A	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0115537	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ZKMMAY0112236A	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7
0	ATLY0106165	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
1	MAY0115181	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	MAY0113833DEB	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ZKNSHY010CG550B	No	7125	1	JUNE 2W Analog Loop Design w/o NP	TN	7
0	MAY0114367	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
2	MAY0114156	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0114921	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
3	MAY0113298A	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZKXGHA0100879B	No	7125	1	JUNE 2W Analog Loop Design w/o NP	NC	7
0	ATLY0106571	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	JCVY0101329B	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZKMMAY0114615	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7
0	MAY0115418	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0115413	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ATLY0106304DEB	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0114298	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0115186	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	ORLP0101585	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MIAPO105985A	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ORLY0102974	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114492	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0114030	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0113780A	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0114642	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MIAPO106074	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114702	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	MAY0113911	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZKATLY0106669	No	7125	1	JUNE 2W Analog Loop Design w/o NP	GA	7
0	MAY0115253	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	MAY0114156	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
3	MAY0113979	No	8300	1	Combos - Loop + Port (Ordering)	FL	2

VER	PON	is it in FOC or Ref Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACCASTN_ID
0 ZXATL0106024A	No	7125	1	UNE 2W Analog Loop Design w/o NP	GA	7	
2 ZXATL0106019	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0115100	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0114411	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0114267	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0113986	No	8300	1	Combos - Loop + Port (Ordering)	FL	2	
0 MIA0Y011441	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
1 ZXATL0106041	No	7125	1	UNE 2W Analog Loop Design w/o NP	GA	7	
0 ATL0Y0106627	No	8300	1	Combos - Loop + Port (Ordering)	FL	2	
0 MIA0Y0113972	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0P0106015	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0114420	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 ATL0Y0106620	No	8300	1	Combos - Loop + Port (Ordering)	GA	8	
0 MIA0Y0115544	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y011492	No	8300	1	Combos - Loop + Port (Ordering)	GA	8	
1 ZXATL010651	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0P0106018	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0114492	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y0114527	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 ZXATL011114A	No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	7	
2 ZXATL0106307	No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	7	
0 MIA0Y011452C	No	8300	1	Combos - Loop + Port (Ordering)	FL	7	
0 MIA0Y011333DEB	No	8300	1	Combos - Loop + Port (Ordering)	FL	7	
5 MIA0Y0113288	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
2 MIA0Y011333	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
0 MIA0Y011519	No	8300	1	Combos - Loop + Port (Ordering)	FL	8	
2 ZXTRGLY0100997D	No	7125	1	UNE 2W Analog Loop Design w/o NP	NC	7	
0 MIA0Y0113501B	No	8300	1	Combos - Loop + Port (Ordering)	FL	2	
2 ZXATL010637A	No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	7	
0 MIA0Y0115537	No	8300	1	Combos - Loop + Port (Ordering)	FL	2	
0 ATL0Y0106627	No	8300	1	Combos - Loop + Port (Ordering)	FL	2	
0 MIA0Y011536A	No	7125	1	UNE 2W Analog Loop Design w/o NP	AL	7	

No LSR in FOC or Rej Raw Data

VER	PON	Is it in FOC or Rej Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACOSTN_ID
2	MAY0115537	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
1	MAY0113996	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0115072	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ZXATLY0106024	No	7125	1	UNE 2W Analog Loop Design w/o NP	GA	7
0	ORLP0101508	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
2	ATLY0106080	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
1	ATLY0106262	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	MAY0115449	No	8300	1	Combos - Loop + Port (Ordering)	GA	2
1	ORLP01015080EB	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	ATLY0106529	No	8392	1	Combos - Loop + Port (Ordering)	FL	8
6	MAY0113298B	No	8300	1	Combos - Loop + Port (Ordering)	GA	2
0	ORLY010102973	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
1	MAY0114505	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
4	MAY0114264	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
1	ATLY0106330	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
1	MAY0115537	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ZKXMY0111296A	No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	2
2	MAY0113979	No	8300	1	Combos - Loop + Port (Ordering)	FL	7
2	ORLP0101508DEB	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114735	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
2	MAY0113489DEB	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY01114156	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZARLGY0100997D	No	7125	1	UNE 2W Analog Loop Design w/o NP	NC	7
0	MAY0114071	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ATLP0103340AA	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0110424D	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZKORLY0102892	No	7125	1	UNE 2W Analog Loop Design w/o NP	FL	7
0	MAY0115539	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114256A	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY01115280	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ATLY0106289	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	ATLY0106589	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	ATLP0103503	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	MAY0114577	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0114541	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114743	No	8300	1	Combos - Loop + Port (Ordering)	FL	8

No LSR in FCC or Rel Raw Data

VER	PON	Is it in FCC or Rel Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACQSTN_ID
0	ZICGHPA0101137	No	7125	1	JUNE 2W Analog Loop Design w/o NP	NC	7
0	ATLY0106455	No	8300	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0114374	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	ATLP0103503	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0114513D	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ORLY0103163	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZNMAY0108504A	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7
0	ZATLY0108498	No	7125	1	JUNE 2W Analog Loop Design w/o NP	GA	7
0	ATLY0106038	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
2	ZKBRP0100737	No	7125	1	JUNE 2W Analog Loop Design w/o NP	AL	7
0	ORLY0103135	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ATLY0106430	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
1	ATLY0105912	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	ATLP0104207	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	ATLY0106080	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	MAY0114264	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY011318CA	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY011553C	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ATLY0106323	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	MAY0114203	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0115509	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	MAY0115544	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0113911	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	ZKORLY0102861	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7
0	MAY0114699	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	ATLY0106632	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
1	MAP0105985	No	8300	1	Combos - Loop + Port (Ordering)	FL	8
0	MAY0114049	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0115488	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
1	ATLY0106532	No	8392	1	Combos - Loop + Port (Ordering)	GA	8
0	MAY0114402	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114549	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114960	No	8300	1	Combos - Loop + Port (Ordering)	FL	2
0	MAY0114049	No	8392	1	Combos - Loop + Port (Ordering)	FL	8
0	ATLY0106474	No	8392	1	Combos - Loop + Port (Ordering)	GA	2
0	ZKORLY0102810A	No	7125	1	JUNE 2W Analog Loop Design w/o NP	FL	7

No LSR in FOC or Ref. Raw Data

VER_PON	is_it_in_FOC_or_Rel	Raw_Data?	OCN	RES_P_CNT	PROD_DESC	STATE_ID	MTHD_ACOSTN_ID
0_JCVY0101334	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011520A	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
0_ATLY010581	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
1_MAY0115411	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
0_MAY011523	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
2_MAY011542	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
1_MAY011539	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011570	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011482	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_ATLP01041547	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011486	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
0_JCVP0100638	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011382	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011474	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY0113298B	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
1_MAY0112534DEB	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
1_ATLY0106166A	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
2_MAY0113734	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY011595	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_DRLY0103096	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY0114165	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY0114733	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_ZXCHAY0100845A	No	7125	1	UNE 2W Analog Loop Design w/o NP	NC		
0_ZXCHAY0100690A	No	8300	1	Combos - Loop + Port	(Ordering)	FL	
0_MAY0114735	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
0_ATLY0106254	No	8300	1	Combos - Loop + Port	(Ordering)	GA	
0_MAY0114952	No	8300	1	Combos - Loop + Port	(Ordering)	FL	

No LSR in FOC or Rel. Raw Data

No LSR in FCC or Rel. Raw Data

VER	RDN	Is it in FCC or Rel. Raw Data?	OCN	RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACQSTN_ID
1	MAY0114565	No	8300	1	1 Combos - Loop + Port (Ordering)	FL	2
	0 YATLY0106262	No	8392	1	1 Combos - Loop + Port (Ordering)	GA	2
	0 STEVEN921	No	7125	1	1 UNE Directory Listing	FL	3
	0 SIFFAUL912	No	7125	1	1 UNE Directory Listing	NC	3
	0 SWANN913	No	7125	1	1 UNE Directory Listing	NC	3
	0 MAY0114861	No	8300	2	Combos - Loop + Port (Ordering)	FL	8
	0 ZYATL0104143	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	0 ZBIRY01000186-C	No	7125	2	UNE 2W Analog Loop Design w/o NP	AL	0
	0 ZKMAV0112399A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 ATLY0106343A	No	8392	2	Combos - Loop + Port (Ordering)	GA	8
	0 ZKNHY0106094A	No	7125	2	UNE 2W Analog Loop Design w/o NP	TN	0
	0 ZKORLY0102837	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	3 ZKMAV0105837A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	7
	0 ZKORLY0102837A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 ZYATL0106096	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	0 ZKMAV0111565	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	2 ZKGCHAPO101216	No	7125	2	UNE 2W Analog Loop Design w/o NP	NC	0
	2 ZYATLY0106344	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	2 ZYATLY0104884A	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	0 ZKMAV0110463A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 MAY0114967	No	8300	2	Combos - Loop + Port (Ordering)	FL	2
	0 ZKGCHAPO101019	No	7125	2	UNE 2W Analog Loop Design w/o NP	NC	0
	3 ATL0106166	No	8392	2	Combos - Loop + Port (Ordering)	GA	8
	2 ZYATLY0106349	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	0 ZKRLGY0100940	No	7125	2	UNE 2W Analog Loop Design w/o NP	NC	0
	0 ZKMAV0110764A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 ZKKNXY0100535A	No	7125	2	UNE 2W Analog Loop Design w/o NP	TN	0
	2 ZKMAV0104922C	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 MAY0112402A	No	8300	2	Combos - Loop + Port (Ordering)	FL	8
	0 ZKMAV0104922C	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	2 ZXBRP0100747	No	7125	2	UNE 2W Analog Loop Design w/o NP	AL	0
	0 ZKCHAY0100881A	No	7125	2	UNE 2W Analog Loop Design w/o NP	NC	0
	0 ZKMAV010207-A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0
	0 ZYATLY0106131	No	7125	2	UNE 2W Analog Loop Design w/o NP	GA	0
	0 ZKCHAY0100874A	No	7125	2	UNE 2W Analog Loop Design w/o NP	NC	0
	0 ZKMAV0111572A	No	7125	2	UNE 2W Analog Loop Design w/o NP	FL	0

VER	PoN	Is it in FOC or Ref.	Raw Data?	OCN	RES_P	CNT	PROD	DESC	STATE_ID	MTHD	ACQSTN_ID
0_ZXATLY01439A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				
0_MIAV011439Z	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ORLY010289	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ZXATLY011233	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				
1_JCVY0101356	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ZXCHAP0101216	No			7125	2	UNNE 2W Analog Loop Design w/o NP	NC				
0_ZXMAV0111233A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
0_ORLY010320	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ZXNSHPO10100633	No			7125	2	UNNE 2W Analog Loop Design w/o NP	TN				
2_ATLY0106166	No			8302	2	Combos - Loop + Port (Ordering)	GA				
0_ZXKNNX0100633	No			7125	2	UNNE 2W Analog Loop Design w/o NP	TN				
0_ZXSOOUTHAB	No			7125	2	UNNE 2W Analog Loop Design w/o NP	NC				
0_MIAV0114467	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ZXMAV011157A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
2_ZXORLY0102637A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
0_ZXATLY0106344A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				
0_ZXNSHPO1010207A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
0_ORLY0102942	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ZXFLETCH	No			8300	2	UNNE 2W Analog Loop Design w/o NP	TN				
0_MIAV011384	No			8300	2	Combos - Loop + Port (Ordering)	FL				
0_ATLY0106094	No			8302	2	Combos - Loop + Port (Ordering)	GA				
0_ZXLODCK918	No			7125	2	UNNE 2W Analog Loop Design w/o NP	TN				
0_ZXATLY0106334A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				
0_ZXMAV011115A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
2_ZXMAV01010868A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	FL				
0_ZXEVENT010919	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				
0_ZXATLY0106332A	No			7125	2	UNNE 2W Analog Loop Design w/o NP	GA				

VER	PON	is it in FOC or Ref	Raw Data?	OCN: RESP_CNT	PROD_DESC	STATE_ID	MTHD_ACQSTN_ID
0	ZXATLY0106331	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	GA	0	0
3	ZXATLY0106096	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	GA	0	0
0	ZXATLY0106096	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	GA	0	0
0	ZXATLY0106107	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	FL	0	0
2	ZXNSHP0101339	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	GA	0	0
0	ZCXA0100875A	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	TN	7	0
0	ZXMAIA0104751A	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	FL	0	0
0	ZXMAIA0104930B	NO	7125	2 UNNE 2WV Analog Loop Design w/o NPF	FL	0	0
1	MAV011230A	NO	8300	3 Combos - Loop + Port (Ordering)	FL	2	8
2	MAV011230A	NO	8300	3 Combos - Loop + Port (Ordering)	FL	2	8
0	ZXMAIA0104930B	NO	8300	3 Combos - Loop + Port (Ordering)	FL	2	8
1	ATLY0106166B	NO	8392	3 Combos - Loop + Port (Ordering)	GA	8	8

No LSR in FOC or Ref, Raw Data

Potential Discrepancies Among BellSouth's Performance Reports – September 2001

(Paired areas should match)	Data Area UNE-P (8300)	UNE-P (8392)	7421 – LNP	7421 – Non LNP	7125 – LNP	7125 – Non LNP	B-band GA (7170)	B-band GA - LNP (7170)
# LSRs submitted --% reject-- mechanized	1366	429	2	30	1842	361	767	784
# LSRs submitted Flow-through report	1369	431	57	32	2190	512	767	790
# Fully mechanized rejections	135	39	0	2	54	91	83	10
# Auto clarifications – Flow-through report	145	40	1	2	171	79	50	12
# Partially Mechanized rejections	182	67	2	1	311	66	29	72
# CLEC caused fall-out-Flow-through report	55	34	4	1	129	75	15	31
# Fully Mechanized FOCs	649	203	0	27	567	137	614	535
# Issued Service Orders-Flow-through report.	645	201	1	27	1041	123	616	569
# completed orders from LNP Order Completion Interval raw data	N/A	N/A	29	N/A	1934	N/A	N/A	859
# completed orders from LNP Disconnect metric	N/A	N/A	510	N/A	2283	N/A	N/A	232
# completed orders from Missed Appointments metric	964	275	29	14	1934	55	1	859
# completed orders from Average Completion Notice Interval raw data files	919	262	14	11	993	38	1	397
# completed orders from Missed Appointments metric – UNE w/LNP	N/A	N/A	N/A	N/A	386	N/A	N/A	N/A
# completed orders from Hot Cut Timeliness Metric raw data	N/A	N/A	N/A	N/A	337	N/A	N/A	N/A

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Post Hearing Exhibit of AT&T in Case No. 2001-105 was served by U.S. mail on the following parties of record this 12nd day of November, 2001:

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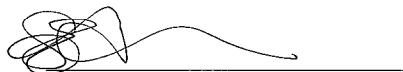
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